

Joseph J. Saltarelli
HUNTON & WILLIAMS LLP
200 Park Avenue
New York, New York 10166
(212) 309-1000

*Attorneys for Defendant,
The Government of the
United Republic of Tanzania*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
INDEPENDENT POWER TANZANIA LTD.,

Plaintiff,

- against -

THE GOVERNMENT OF THE REPUBLIC
OF TANZANIA,

Defendant.
-----X

07 CV 10366 (AKH)

NOTICE OF MOTION

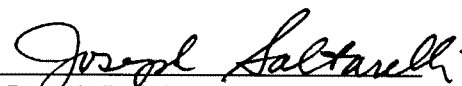
PLEASE TAKE NOTICE that, upon the Declaration of Sazi B. Salula, executed January 17, 2008, with exhibits thereto, the Declaration of Joseph E. Sokoine, executed January 17, 2008, with exhibits thereto (both as more fully described in the accompanying Table of Contents), and the accompanying Memorandum of Law, Defendant, The Government of the United Republic of Tanzania, will move before the Honorable Alvin K. Hellerstein, United States District Judge, on Wednesday, February 20, 2008, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, pursuant to Fed. R. Civ. P. 12(b)(1), (2); and 28 U.S.C. §§ 1330(a), (b) for an order dismissing the Complaint, and awarding costs, disbursements and such other relief as the Court deems just.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 6.1(b) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, opposition papers shall be served within ten business days after service of the moving papers, and any reply papers shall be served within five business days after service of the answering papers.

Dated: New York, New York
January 22, 2008

Respectfully Submitted,

HUNTON & WILLIAMS LLP

By: 
Joseph J. Saltarelli
200 Park Avenue
New York, New York 10166
(212) 309-1000

- and -

John Jay Range
(to be admitted *pro hac vice*)
1900 K Street, N.W.
Washington, D.C. 20006
(202) 955-1500

*Attorneys for Defendant,
The Government of the
United Republic of Tanzania*

TO: Robert C. Sentner, Esq.
NIXON PEABODY LLP
437 Madison Avenue
New York, New York 10022

*Attorneys for Plaintiff
Independent Power Tanzania Ltd.*

Table of Contents

Declaration of Joseph E. Sokoine, executed January 17, 2008:

Exhibit 1: Envelope bearing pleadings delivered to Embassy of Tanzania;

Exhibit 2: Contents of envelope delivered to Embassy of Tanzania

Declaration of Sazi B. Salula, executed January 18, 2008:

Exhibit A: Power Purchase Agreement between the Tanzania Electric Supply Company and Independent Power Tanzania Ltd. ("IPTL"), dated 26 May 1995;

Exhibit B: Implementation Agreement between the Government of Tanzania ("GOT") and IPTL, dated 8 June 1995;

Exhibit C: Guarantee Agreement between GOT and IPTL, dated 8 June 1995

DECLARATION OF SERVICE

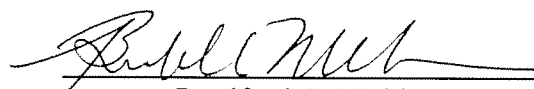
Bradford C. Mulder, hereby declares under penalty of perjury pursuant to 28 U.S.C. § 1746.

I am Managing Clerk at the law firm of Hunton & Williams LLP, attorneys for Defendant The Government of the United Republic of Tanzania.

That on January 22, 2008, I served a true copy of the attached Notice of Motion to Dismiss the Complaint, on Plaintiff's counsel at the address listed below, by depositing the same in a duly enclosed and sealed wrapper, for Federal Express Next Day Overnight Service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 22, 2008.


Bradford C. Mulder

TO: Robert C. Sentner, Esq.
NIXON PEABODY LLP
437 Madison Avenue
New York, New York 10022

Attorneys for Plaintiff